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May 18, 2020

VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Petróleos de Venezuela, et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF
(S.D.N.Y.)

Dear Judge Failla:

We write on behalf of all parties pursuant to Rule 2(c) of this Court's Individual Rules of Practice in Civil Cases to jointly request extensions of the summary judgment filing dates and page limits.

In light of difficulties caused by the ongoing COVID-19 crisis, the parties propose the following filing dates, which would not change the current hearing date, subject, of course, to that date remaining acceptable to the Court:

	<u>Current Date</u>	<u>Proposed Date</u>
Motions for summary judgment:	May 22, 2020	June 5, 2020
Oppositions to summary judgment motions:	June 11, 2020	June 25, 2020
Replies to summary judgment motions:	June 23, 2020	July 13, 2020
Hearing date for summary judgment motions	July 24, 2020	July 24, 2020

In the course of preparing summary judgment papers, it has become clear that the standard page limits will not allow the parties to address the issues raised by the numerous claims, counterclaims, and defenses and competing expert reports in sufficient depth to properly assist the Court in deciding this important case. Accordingly, the parties propose limits of 60 pages for opening and opposition briefs and 30 pages for replies.

The parties respectfully request that the Court approve the proposed summary judgment dates and page limits, and we are available to address any questions the Court may have.

Respectfully,



James R. Bliss
of PAUL HASTINGS LLP
cc: Counsel of record